

***His Highness Prince Karim Aga Khan v. Nagib Tajdin and Alnaz Jiwa et al.*, Reference Proceeding in Court File No. T-514-10 further to the Judgment of Mr. Justice Harrington dated March 4, 2011**

REVISED PLAINTIFF'S SUMMARY OF UNDERTAKINGS
EXAMINATION FOR DISCOVERY OF ALNAZ JIWA HELD NOVEMBER 8, 2011

No.	Page Ref.	Plaintiff's Question Summary and Defendant Position at Discovery	Defendant's Response to the Undertaking
1.	pp. 21-22 l. 11-8 Q. 75-76	<u>UNDERTAKING:</u> To search the listserv ilm-net and produce all relevant correspondence?	Searched and produced relevant documents set out in Jiwa's motion record: Tab 2(d) pages 61 to 84; Tab 2(a) pages 21 to 24; Tab 2(b) page 33
2.	p. 22-23 l. 9-17 Q. 78-80	<u>UNDERTAKING:</u> To search the listserv ilm-net from December 2009 to present for anything with respect to Golden Edition or anything with respect to the sale and purchase or distribution of the Golden Edition.	Same as above.
3.	p. 28 l. 11-25 Q. 96-98	<u>UNDERTAKING:</u> With respect to the Fed Ex invoice located at Exhibit 1, Tab D-4 (Supplementary Affidavit of A. Jiwa), to produce the original copy.	Produced to Mr. Gray at court on April 24, 2012.
4.	pp. 49-51 l. 24-8 Q. 187-192	<u>UNDERTAKING:</u> To search the e-mail account alnazjiwa@yahoo.com and produce all relevant documents.	Searched. No documents found. Note: this email is Jiwa's law office email and not used for personal matters;

5.	p. 51 l. 1520 Q. 194	<u>UNDERTAKING:</u> To confirm that Mr. Jiwa has searched all of his e-mail accounts and produced relevant documents, including: Jiwa Law, alnazjiwa@hotmail.com , alnazjiwa@yahoo.com or .ca and any gmail account.	Searched all accounts, and produced relevant documents set out in Jiwa's motion record: Tab 2(d) Page 60 Tab 2(b) 34 to 36
6.	pp. 58-59 l. 21-20 Q. 225-230	<u>UNDERTAKING:</u> To search all of Mr. Jiwa's e-mail accounts using the search terms "Golden Edition", and "GE" from December 2009 to present and produce all relevant documents.	Searched. Other than documents produced, no other relevant documents exist.
7.	pp. 7-8 l. 23-19 Q. 18-23	<u>N/A:</u> The parties adopt the questions asked and answers provided at the cross-examination of Mr. Jiwa taken on October 19, 2011 to be part of this examination for discovery.	No response required.